

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Domondric L. Green,

Case: 22-mj-30222

Filed: 5/10/2022

CMP: USA v GREEN (MAW)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 7, 2022 in the county of Genesee in the Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

There is probable cause to believe that on May 7, 2022, in the Eastern District of Michigan, Domondrick Latreal Green, knowing that he had been convicted of a felony offense punishable by incarceration for a term exceeding one year, knowingly possessed, in and affecting commerce, firearms in violation of 18 U.S.C. § 922(g)(1).

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: May 10, 2022

City and state: Detroit, MI



Complainant's signature

Dustin Hurt, Special Agent, ATF

Printed name and title



Judge's signature

Elizabeth Stafford, United States Magistrate Judge

Printed name and title

**AFFIDAVIT**

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since October of 2018. I am currently assigned to the Detroit Field Division, Flint Field Office. Before working for the ATF, I was employed by the Michigan Department of State Police (MSP) for approximately seven years. Before working for MSP, I was a local police officer for the Grand Ledge Police Department for approximately three years. I held numerous positions with the MSP, including Detective Sergeant in the Polygraph Unit and Task Force Officer with the FBI. During my employment with ATF and MSP, I have conducted or participated in numerous criminal investigations focused on firearms, armed drug trafficking, and criminal street gangs, and other violations of federal law.

2. I make this affidavit from personal knowledge based on my participation in this investigation, my review of reports and other materials prepared by those who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. Around midnight on May 7, 2022, a police officer on a MSP helicopter (MSP Aviation) observed a man with a rifle get into a black Jeep Grand Cherokee in a parking lot in Flint, Michigan. MSP Aviation surveilled the man as he drove and parked in the parking lot of the Liquor Corner at the intersection of Saginaw Street and Leith Street in Flint.

4. Fully marked MSP patrol vehicles initiated a traffic stop on the 2011 Jeep Grand Cherokee bearing MI Registration ENU9703 and attempted to contact with the man, later identified as Domondrick Latreal Green (b/m XX/XX/1996). The Jeep fled from the area at a high rate of speed. MSP Aviation continued to monitor the Jeep as it fled, and MSP units got into position of intercept it. MSP Aviation observed the Jeep flee and eventually saw the Jeep stop. MSP Aviation observed the driver (Green) exit the vehicle and flee on foot with the rifle in his possession. A female passenger remained in the Jeep. MSP Aviation observed Green run while holding the rifle in his hands. MSP Aviation observed Green attempt to hide in between two buildings while still holding the rifle. Troopers arrived near the building and resumed chased Green, who continued to flee from Troopers. MSP Aviation then saw that Green was carrying a rifle in his right hand and a pistol in his left hand. As Green jumped a fence, MSP Aviation saw Green throw the rifle. Green still had the pistol in his hands as Troopers closed the distance in the foot pursuit.

As Troopers ordered Green to stop, MSP Aviation saw him throw the pistol as he continued to flee from Troopers. Shortly thereafter, Troopers took Green into custody. Officers identified Green by his Michigan Driver's License.

5. The rifle and pistol were recovered by a MSP Trooper. The rifle was a Pioneer Arms Co., model Draco, 7.62 caliber rifle bearing S/N: PAC1139287. The Draco rifle was loaded with 58 rounds of 7.62 caliber ammunition recovered from two magazines which were taped together. There was one chambered round inside the rifle. The pistol was a Glock Inc., model 17, 9mm caliber pistol bearing S/N: BRAT245. The pistol was loaded with 32 rounds of 9mm caliber ammunition one of which was chambered inside the pistol.

6. Officers observed that Green had suffered a cut to his left hand which was bleeding. Additionally, there was blood located on the Micro Draco. I believe it is likely that the blood on the Draco rifle came from the cut on Green's left hand.

7. As part of this investigation, I had an opportunity to query the criminal history of Green which yielded the following:

- 2012 – Green received a juvenile adjudication for Felony Attempted Armed Robbery and Felony Assault with a Deadly Weapon in the 7<sup>th</sup> Circuit Court of Michigan.
- 5/4/2015 – Green pled guilty to Carrying a Concealed Weapon in the 7<sup>th</sup> Circuit Court of Michigan. CFN: 14-035499-FH. Green was sentenced to one year incarceration.

- 5/9/2016 – Green pled no contest to Assault with Intent to do Great Bodily Harm x 3, Felon in Possession of a Firearm, Felon in Possession of Ammunition, and Felony Firearm all with Habitual Offender Status. Green was sentenced to 3 to 15 years incarceration.
- Green was on state parole at the time of this incident.

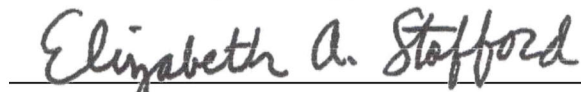
8. I am recognized by ATF as having expertise in the interstate travel and manufacture of firearms. The Pioneer Arms Co. rifle and the Glock pistol were manufactured outside of the state of Michigan and are firearms defined in Chapter 44, Title 18, United States Code.

9. I have probable cause to believe that on May 7, 2022, in the Eastern District of Michigan, Domondrick Latreal Green, knowing that he had been convicted of a felony offense punishable by incarceration for a term exceeding one year, knowingly possessed, in and affecting commerce, firearms in violation of 18 U.S.C. § 922(g)(1).



Dustin Hurt  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means on this 10<sup>th</sup> day of May, 2022.



Hon. Elizabeth Stafford  
United States Magistrate Judge